

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

KYSS BURTON, BY HER MOTHER,
SAKIA HALL AS NEXT FRIEND AND
SAKIA HALL,

Plaintiff,

v.

Case No. 3:11-cv-00065-JRS

HAROLD FORD,

Defendant.

MOTION TO WITHDRAW MOTION TO COMPEL

Defendant, Harold Ford (“Ford”), by counsel, hereby moves to withdraw the Motion to Compel plaintiff to file Initial Disclosures, to provide complete and executed Answers to Interrogatories and Responses to Request for Production of Documents which were served upon her on or about March 30, 2011, and to sit for a deposition. The undersigned counsel has conferred with counsel for Plaintiff regarding Plaintiff’s failure to file Initial Disclosures, and plaintiff has provided complete and executed Answers to Interrogatories and Responses and sat for a deposition. Based upon those discussions and the terms of the enclosed Proposed Order, Ford agrees to withdraw his Motion to Compel and requests that the Court enter the attached Proposed Order.

HAROLD FORD

By Counsel

/s/

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C E R T I F I C A T E

I hereby certify that on the 14th day of June, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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